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By: _____	DEPUTY _____

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 10 *Sheila Story and Mikayla Story*

7 IN THE UNITED STATES DISTRICT COURT
 8 FOR THE DISTRICT OF NEVADA

10 PARIS REGAN, MARK REGAN,
 11 and PAMELA REGAN,

CASE NO: 3:16-CV-00508-MMD-VPC

12 Plaintiffs,

13 vs.

14 CARSON CITY SCHOOL DISTRICT, a
 15 Political Subdivision of the State of Nevada;
 16 RICHARD STOKES, TASHA FUSON,
 17 MARK RODINA, SHEILA STORY,
 18 MIKAYLA STORY, SHARI STOCK,
 19 MADISON STOCK, R.S., KIMBERLY
 20 SEIFERT, AMBER SEIFERT, K.C.,
 21 HALLE CARL, DONNA CARL, and
 22 DOES 1-50, and DOE ENTITIES 1-50,

23 Defendants.

24 **STIPULATION AND ORDER TO EXTEND DEADLINES**

25 **SET FORTH IN STIPULATED PROTOCOL FOR DISCOVERY OF**

26 **ELECTRONICALLY STORED INFORMATION**

27 The undersigned parties, by and through their counsel of record, have conferred regarding
 28 the deadlines established for various procedures to be used in the preservation and disclosure of
 Electronically Stored Information (ESI), as set forth in the ORDER entered by this Court on
 December 19, 2016 (see DOC. #38, referred to herein as the "ESI Order").

During the Case Management Conference on November 2, 2016, the Court directed counsel
 to meet and confer and develop an ESI protocol to be used in the case, and to file such protocol no

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1 later than December 19, 2016 (see DOC. #30). The parties met and conferred and began the
2 development of the protocol, which established various timelines for enumerated procedures.

3 A second Case Management Conference was held on December 2, 2016 (see DOC. #33).
4 The Court found that discovery between plaintiffs and the Carson City School Districts would
5 proceed, but discovery between the plaintiffs and all other defendants would be stayed. The Court
6 also encouraged counsel for plaintiffs and the Carson City School District defendants to meet and
7 confer to determine what discovery shall be completed prior to the settlement conference.
8 Accordingly, counsel have conferred regarding various discovery matters and there are no disputes
9 pending.

10 As this Court has advised the parties, the preservation, analysis, and disclosure of ESI is an
11 exceedingly costly endeavor, including, in this case, an agreement among parties to engage the
12 services of Qualified Forensic Experts to assist in the process. The significant expenditure of costs
13 to comply with the ESI Order in advance of the settlement conference is not conducive to settlement
14 of the case. Because discovery between the plaintiffs and several defendants has been stayed, and
15 because discovery between the plaintiffs and the Carson City School District is limited to that
16 deemed "necessary" to participate meaningfully with the settlement conference scheduled on January
17 31, 2017, the parties seek the Court's approval to stay the deadlines for various procedures set forth
18 in the ESI Order (see Section II, items 2, 3, 4, 6, and 8). The parties agree that if the case does not
19 settle at the settlement conference, new deadlines for compliance with the procedures set forth in the
20 ESI Order will be established.

21 Therefore, the parties seek an ORDER staying the deadlines set forth in the ESI Order, with
22 such deadlines to be reestablished if the case does not settle on January 31, 2017.

23 **DATED:** December 29, 2016.

24 Agreed to by:

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26 Day R. Williams
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28 ///

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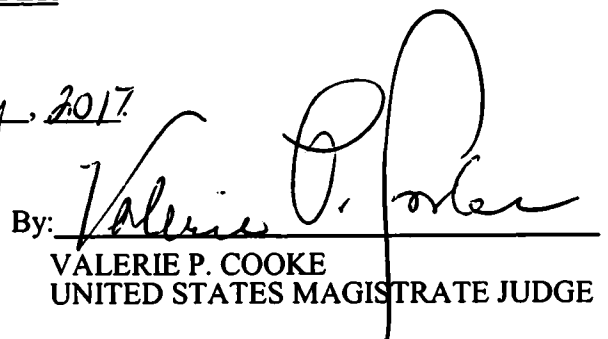
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15
16 **ORDER**

17 IT IS SO ORDERED.

18 DATED this 3rd day of January, 2017.

19
20 By: 
21 VALERIE P. COOKE
22 UNITED STATES MAGISTRATE JUDGE
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